

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
CASE NO. 24-CR-20188

UNITED STATES OF AMERICA,
Plaintiff,

vs.

CARLOS ANDRES VELEZ,

Defendant.

DEFENDANT'S OBJECTIONS TO
PRESENTENCE INVESTIGATION REPORT

COMES NOW the Defendant, **CARLOS ANDRES VELEZ**, by and through his undersigned counsel, and presents herewith, his Objections to the Presentence Investigation Report (“PSR”), and states as follows:

1. **Objection to Paragraph 84: “Base Offense Level”**

This paragraph states the laundered funds was more than \$9,500,000 and \$25,000,000: the Defendant should be liable for the laundered funds for D&A AMZ Seller and Sunshine Loans. The government is asking this Court to hold the Defendant liable for a hair over \$9,000.000 in laundered funds because he legally created businesses for Gutierrez.

2. **Objection as to Paragraph 87: “Role Adjustment”**

The Defendant respectfully objects to paragraph 87: the Defendant is alleged to have abused a position of public or private trust or used a special skill, in a manner that significance facilitated the commission or concealment of the offense under Section 3B1.3.

3. **Objection to Paragraph 93: "Total Offense Level"**

The Defendant objects to this paragraph. The Presentence Investigation Report states that the total offense level should be a level 27.

WHEREFORE, the Defendant, **CARLOS ANDRES VELEZ**, respectfully prays that this Honorable Court sustain the within objections to the Presentence Investigation Report and direct the United States Probation Office to amend the Presentence Investigation Report as requested and as set forth above in paragraphs 1 through 3, inclusive.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of July, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached service list in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

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